

REMARKS/ARGUMENTS

Reexamination and reconsideration of this application as amended is requested. By this Amendment, no claims have been amended, no claims have been canceled, and no new claims have been added. After this Amendment, Claims 1-32 remain pending in this application.

¶1.131 Declaration

The Examiner rejected Claims 1, 3-6 and 28 under 35 U.S.C. §102(e), as being anticipated by Vedula et al., (US 2005/0015732). The Applicants are submitting herewith a Declaration under 37 CFR ¶1.131 to overcome the Vedula publication. Accordingly, the Applicants submit that the Vedula publication is now removed as a reference under §102(e).

The Declaration under 37 CFR ¶1.131 with associated supporting evidence is submitted to establish that the invention claimed in the application was reduced to practice prior to the effective date of the cited Vedula publication, i.e., prior to September 14, 2000. The Applicants reduced to practice the invention disclosed and claimed in the application by creating a working prototype system that demonstrated the claimed features of the present invention prior to September 14, 2000. See the attached evidence that includes twelve (12) source code listings that illustrate the prototype system using features described and claimed in the present patent application, including such features as: Translating a dataset from a source schema to a target schema according to a set of mapping rules, where each schema includes a set of data elements and a set of relationships among the data element, where each rule includes a type and instructions for obtaining one or more target data element values as a function of one or more source data element values, and where the type contains all the information about relationships among data elements used by the function.

Therefore, Applicants believe that sufficient evidence has been presented to prove that the presently claimed invention was invented and reduced to practice by the

applicants prior to September 14, 2000. Note that there are seven (7) identical, duplicate Declarations under 37 CFR ¶1.131, each signed by one (1) inventor of the seven (7) inventors of the present invention. All inventors of the present invention have executed a Declaration under 37 CFR ¶1.131. Also, note that Exhibits B, C and D of the Declaration under 37 CFR ¶1.131 are redacted in that certain dates were removed.

Notwithstanding the removal of the Vedula publication as an available prior art reference, Applicants wish to briefly point out below some clear distinguishing features of the presently claimed invention over any other reference that may be similar to the Vedula publication.

Claims Rejection under 35 U.S.C. §102(e)

(1) In particular, the Examiner concluded that the second step of independent Claims 1 and 28, is anticipated by Vedula et al., and the Examiner identified several paragraphs of Vedula et al., in support thereof. Applicants respectfully disagree with the Examiner.

FIGS. 1 and 2 and the discussion in paragraphs 0069 through 0072 of the Vedula publication merely describe the state of the art prior to the Applicants' invention and the alternative of using an XSLT map and XSL engine to describe a mapping between one XML schema and another. The discussion in paragraph 0010 points out the difficulty of programming for XSL and points out a need for a simple graphical (visual) programming interface. The invention fulfills the need for visualizing XSLT.

None of the paragraphs from the Vedula publication teach the idea that a mapping rule may be constructed as a type plus a set of instructions. The functions described in the Vedula publication correspond to the set of instructions alone. The importance of the type in the invention lies in the fact that it captures all information from the source schema about the relationships among the data elements used as inputs to the function (set of instructions). The explicit use of the type allows a user to represent with simple instructions what to do about repeating elements and groups of elements in an XML schema. For example, the invention allows us to specify that one set of repeating

elements is to be transformed into a set of repeating elements of the same cardinality by a simple function that defined to work on one element and applied element by element to the source to produce a target set of transformed elements in one-to-one correspondence with the original set. The Vedula publication does not discuss a type and does not mention a type that captures all source schema information about relationships among data elements to be transformed by a function. In particular, the Vedula publication does not teach how to capture the information that a set of elements are all instances of a repeating element in the schema. The graphical interface makes no mention of information about repetitions. In the phrase "all information" recited in Claim 1, the "all" is intended to include information about repetitions, not just about the information available from examining the tree structure.

Therefore, in view of the foregoing remarks, Applicants believe that the rejection of Claims 1 and 28 under 35 U.S.C. §102(e) has been overcome. Applicants request that the Examiner allow Claims 1 and 28.

(2) In particular, the Examiner concluded that Claims 3 is anticipated by Vedula et al., and identified several paragraphs of Vedula et al., in support thereof. Applicants respectfully disagree with the Examiner. Claim 3 depends upon Claim 1, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 3 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that Vedula et al., do not teach the presently claimed invention as recited for Claim 3, and that the rejection of Claim 3 under 35 U.S.C. §102(e) has been overcome. Applicants request that the Examiner allow Claim 3.

(3) In particular, the Examiner concluded that Claims 4 and 5 are anticipated by Vedula et al., and identified several paragraphs of Vedula et al., in support thereof. Applicants respectfully disagree with the Examiner. Claims 4 and 5 depend upon Claim 1, and because dependent claims recite all the limitations of the independent claim, it is believed that Claims 4 and 5 also recite in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that Vedula et al., do not teach the presently

claimed invention as recited for Claims 4 and 5, and that the rejection of Claims 4 and 5 under 35 U.S.C. §102(e) has been overcome. Applicants request that the Examiner allow Claims 4 and 5.

(4) In particular, the Examiner concluded that Claim 6 is anticipated by Vedula et al., and identified several paragraphs of Vedula et al., in support thereof. Applicants respectfully disagree with the Examiner. The Examiner relied upon paragraph 0015 of Vedula et al., to reject Claim 6. The Examiner's reliance upon the aforementioned paragraph of Vedula et al., is misplaced because this paragraph teaches only that string class methods may be used. In addition, Claim 6 depends upon Claim 1, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 6 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the rejection of Claim 6 under 35 U.S.C. §102(e) has been overcome. Applicants request that the Examiner allow Claim 6.

Claim Rejections under 35 USC §103(a)

The Examiner rejected Claims 2 and 29 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., (US2002/0108121), and further in view of Walker (US 2004/0015840). As noted hereinabove, the Applicants are submitting herewith a declaration under 37 CFR ¶1.131 to overcome the Vedula reference. Accordingly, the Applicants submit that the Vedula publication is now removed as an available reference under §103(a). The Vedula publication cited by the Examiner was filed in the U.S. Patent and Trademark Office on September 14, 2000, which is after the date of actual reduction to practice of the invention. Accordingly, the Vedula publication cannot be cited against the present application in a rejection under 35 U.S.C. §103(a).

Notwithstanding the removal of the Vedula publication as an available prior art reference, Applicants wish to further point out below some clear distinguishing features

of the presently claimed invention over any other combination that may be similar to Vedula et al., in view of Walker.

(5-6) Claim 2 depends upon Claim 1, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 2 also recites in allowable form. In view of the remarks set forth herein regarding Claim 1, Applicants believe that the combination of Vedula et al., and Walker does not teach or suggest all the steps of Claim 2, and that the rejection of Claim 2 under 35 U.S.C. §103(a) has been overcome. Therefore, Applicants request that the Examiner allow Claim 2.

(7) The Examiner rejected Claims 7-8, 14-15, 18-26, 30 and 32 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., (US2005/0015732), and further in view of Alao et al., (US2002/0108121). As noted hereinabove, the Applicants are submitting herewith the Declaration under 37 CFR ¶1.131 to overcome the Vedula publication. Accordingly, the Applicants submit that the Vedula publication is now removed as a reference under 35 U.S.C. §103(a).

Notwithstanding the removal of the Vedula publication as an available prior art reference, Applicants wish to further point out below some clear distinguishing features of the presently claimed invention over any other combination that may be similar to Vedula et al., in view of Alao.

(8) In particular, the Examiner rejected Claims 7 and 30 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Alao et al., in support thereof. However, Claims 7 and 30 depend upon Claim 1 and Claim 28, respectively, and because dependent claims recite all the limitations of the independent claim, it is believed that Claims 7 and 30 also recite in allowable form. Therefore, in view of the arguments made herein in support of Claims 1 and 28, Applicants request that the Examiner allow Claims 7 and 30.

(9) In particular, the Examiner rejected Claim 8 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Alao et al., in support thereof.

Alao et al., do not teach about mapping rules (from schema to schema) but about business rules that determine where datasets are to be sent and what is to be done with them. Nowhere does Alao et al., teach about a mapping rule type that captures all source schema information about relationships among a set of data elements (see the Claim 1). Paragraphs, 0070, 0146, 0150, and 0197 of Alao et al., do not mention “types” in this sense. Note that the word “type” is used here in a technical (mathematical) sense, rather than as a synonym for the word “kind”. Neither Vedula et al., nor Alao et al., nor any combination teach about this notion of type, nor is the notion implicit in their teaching.

Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claim 8, and that the rejection of Claim 8 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 8.

(10) In particular, the Examiner rejected Claims 14, 15 and 32 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Vedula et al., and Alao et al., in support thereof.

In the Vedula publication, neither paragraph nor FIG. 3C, to which it refers, mentions anything about extracting a second dataset from the destination database. Paragraph 0075 of the Vedula publication discusses a very simple kind of mapping rule. Paragraphs 0017, 0080, 0084, and 0085 of the Vedula publication discuss user interaction with the programming interface to specify mapping rules. These paragraphs do not discuss destination databases or modifying the contents of one dataset based on the contents of a second dataset that is extracted from a destination database. FIG. 14 and paragraphs 0100 and 0101 of the Vedula publication simply mention various devices for persistent storage. Neither Vedula et al., nor Alao et al., disclose “modifying the first destination dataset according to information in the second destination dataset”, as recited in the fourth element of Claims 14 and 32. Therefore, in view of the foregoing remarks,

Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claims 14 and 32, and that the rejection of Claims 14 and 32 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claims 14 and 32.

Claim 15 depends upon Claim 14, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 15 also recites in allowable form. Therefore, Applicants request that the Examiner allow Claim 15.

Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claims 14, 15 and 32, and that the rejection of Claims 14, 15 and 32 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claims 14, 15 and 32.

(11) In particular, the Examiner rejected Claim 18 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Vedula et al., in support thereof.

Claim 18 depends upon Claim 14, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 18 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claim 18 that the rejection of Claim 18 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 18.

(12) In particular, the Examiner rejected Claim 19 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Vedula et al., and Alao et al., in support thereof.

Neither Vedula et al., nor Alao et al., teach the specific design composed of a central bridge component that performs XML to XML translation communicatively coupled with multiple application specific gateway components that translate XML into application specific formats. Vedula et al., discuss arbitrary distributed systems in which

one might do XML to XML translation in one or more components. Alao et al., teach about gateway components that translate from XML to application specific formats. It is not obvious that the teachings be combined in a central bridge to multiple gateway configuration.

Claim 19 depends upon Claim 14, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 19 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claim 19 that the rejection of Claim 19 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 19.

(13) In particular, the Examiner rejected Claim 20 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Vedula et al., and Alao et al., in support thereof.

Neither Vedula et al., nor Alao et al., teach the specific design composed of a central bridge component where documents are stored in persistent storage and multiple application specific gateway components where documents are stored in volatile storage. The particular distributed configuration of the invention, in which only one unique bridge component stores documents in persistent storage and the other components use only volatile storage, is novel in the light of prior art that does not teach the idea or advantages of centralized persistent storage combined with efficient volatile storage at multiple specific gateway components.

Claim 20 depends upon Claim 19, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 20 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claim 20 that the rejection of Claim 20 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 20.

(14) In particular, the Examiner rejected Claims 21 and 22 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Vedula et al., and Alao et al., in support thereof.

Claims 21 and 22 depend upon Claim 19, and because dependent claims recite all the limitations of the independent claim, it is believed that Claims 21 and 22 also recite in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claims 21 and 22 that the rejection of Claims 21 and 22 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claims 21 and 22.

(15) In particular, the Examiner rejected Claim 23 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Vedula et al., and Alao et al., in support thereof.

None of the paragraphs from the Vedula publication teaches the idea that a mapping rule may be constructed as a type plus a set of instructions. The functions described in the Vedula publication correspond to the set of instructions *alone*. The importance of the “type” in the invention lies in the fact that it captures all information from the source schema about the relationships among the data elements used as inputs to the function (set of instructions). The explicit use of the type allows a user to represent with simple instructions what to do about repeating elements and groups of elements in an XML schema. For example, it allows a user to specify that one set of repeating elements is to be transformed into a set of repeating elements of the same cardinality by a simple function that defined to work on one element and applied element by element to the source to produce a target set of transformed elements in one to one correspondence with the original set. Vedula et al., do not discuss a type and does not mention a type that captures all source schema information about relationships among data elements to be transformed by a function. In particular, Vedula et al., do not teach how to capture the information that a set of elements are all instances of a repeating element in the schema. The graphical interface of Vedula et al., makes no mention of information about

repetitions. When Claim 23 refers to “all information” the “all” is intended to include information about repetitions, not just about the information available from examining the tree structure.

Claim 23 depends upon Claim 22, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 23 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claim 23 that the rejection of Claim 23 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 23.

(16) In particular, the Examiner rejected Claims 24 and 25 as being unpatentable over Vedula et al., and identified several paragraphs of Vedula et al., in support thereof.

Claims 24 and 25 depend upon Claim 23, and because dependent claims recite all the limitations of the independent claim, it is believed that Claims 24 and 25 also recite in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claims 24 and 25 that the rejection of Claims 24 and 25 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claims 24 and 25.

(17) In particular, the Examiner rejected Claim 26 as being unpatentable over Vedula et al., and further in view of Alao et al., and identified several paragraphs of Vedula et al., and Alao et al., in support thereof.

Claim 26 depends upon Claim 19, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 26 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Alao et al., does not teach the presently claimed invention as recited for Claim 26 that the rejection of Claim 26 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 26.

(18) The Examiner rejected Claims 10-13 and 31 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., (US2005/0015732), and further in view of Williams (U.S. Pat. No. 6,591,272). As noted hereinabove, the Applicants are submitting herewith the Declaration under 37 CFR 1.131 to overcome the Vedula reference. Accordingly, the Applicants submit that the Vedula publication is now removed as a reference under §103(a), and, therefore, any combination that includes the Vedula publication fails as a reference.

Notwithstanding the removal of the Vedula publication as an available prior art reference, Applicants wish to further point out below some clear distinguishing features of the presently claimed invention over any other combination that may be similar to Vedula et al., in view of Williams.

(19) In particular, the Examiner rejected Claims 10 and 31 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., and further in view of Williams, and identified several paragraphs of Vedula et al., and Williams, in support thereof. Applicants respectfully disagree with the Examiner. The Examiner's reliance upon the aforementioned paragraphs of Vedula et al., and Williams is misplaced because Williams at col. 4, lines 48-59 merely discusses metadata assembled in a "vendor-neutral standardized view" and representing classes as templates. Williams at col. 7, lines 27-51 also discusses standardized views. Williams at col. 10 lines 3-17 discusses construction of "definition objects" by method steps including "schemas are scanned". Williams at col. 22, lines 7-9 discusses "databases and the associated schema tables to be scanned" for the purpose of display to a user call the "developer". Williams at col. 35, lines 4-15 suggests a program component called "OSF" that "scans the tables which make up the database schema and then builds and modifies a set of . . . Database Normalization Objects." The process described results in a standardized view for the developer. However, neither Williams nor Vedula et al., discusses scanning a database for outgoing requests. Thus, claims 10 and 31 are each novel and independent over any combination of Williams and Vedula et al.

Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Williams does not teach the presently claimed invention as recited for Claims 10 and 31 that the rejection of Claims 10 and 31 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claims 10 and 31.

(20) In particular, the Examiner rejected Claim 11 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., and further in view of Williams, and identified several paragraphs of Williams in support thereof.

Claim 11 depends upon Claim 10, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 11 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Williams does not teach the presently claimed invention as recited for Claim 11 that the rejection of Claim 11 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 11.

(21) In particular, the Examiner rejected Claim 12 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., and further in view of Williams, and identified two paragraphs of Williams in support thereof.

Claim 12 depends upon Claim 11, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 12 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Williams does not teach the presently claimed invention as recited for Claim 12 that the rejection of Claim 12 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 12.

(22) In particular, the Examiner rejected Claim 13 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., and further in view of Williams, and identified several paragraphs of the Vedula publication in support thereof.

Claim 13 depends upon Claim 10, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 13 also recites in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Williams does not teach the presently claimed invention as recited for Claim 13 that the rejection of Claim 13 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 13.

(23-24) The Examiner rejected Claim 27 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., (US2005/0015732), and further in view of Draper et al., (U.S. Pat. No. 6,581,062). As noted hereinabove, the Applicants are submitting herewith the Declaration under 37 CFR ¶1.131 to overcome the Vedula reference. Accordingly, the Applicants submit that the Vedula publication is now removed as a reference under §103(a), and, therefore, any combination that includes the Vedula publication fails as a reference.

Notwithstanding the removal of the Vedula publication as an available prior-art reference, Applicants wish to briefly point out a distinguishing feature of the presently claimed invention over any other combination that may be similar to Vedula et al., in view of Draper.

Claim 27 depends upon Claim 19, and because dependent claims recite all the limitations of the independent claim, it is believed that Claim 27 also recites in allowable form. Draper et al., also fails to teach all the elements of Claim 27, including, for example, an SQL to XML translator. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Draper et al., does not teach the presently claimed invention as recited for Claim 27 that the rejection of Claim 27 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claim 27.

(25-26) The Examiner rejected Claims 16-17 under 35 U.S.C. §103(a) as being unpatentable over Vedula et al., (US2005/0015732), and further in view of Dungan et al., (U.S. Pat. No. 6,363,411). As noted hereinabove, the Applicants are submitting herewith

the Declaration under 37 CFR 1.131 to overcome the Vedula reference. Accordingly, the Applicants submit that the Vedula publication is now removed as a reference under §103(a), and, therefore, any combination that includes the Vedula publication fails as a reference.

Notwithstanding the removal of the Vedula publication as an available prior art reference, Applicants wish to further point out below some clear distinguishing features of the presently claimed invention over any other combination that may be similar to Vedula et al., in view of Dungan, et al.

The Examiner identified two portions of Dungan et al., in support thereof the rejection. The Examiner's reliance upon the aforementioned two portions of Dungan et al., is misplaced because Dungan et al., at col. 46, lines 8-65 discusses returning a null value under certain circumstances. It does not discuss replacing null values in a dataset with other values.

Dungan et al., at col. 110, line 25 to col. 111, line 35 also discusses returning a null value during processing to indicate "no routing preference". It does not discuss replacing null values in a dataset with other values.

The paragraphs of Dungan et al., identified by the Examiner discuss processing in which null values are generated or returned. These values are sometimes used to determine a next step in processing. The context has nothing to do with the transformation of datasets.

Furthermore, claims 16 and 17 depend upon Claim 14, and because dependent claims recite all the limitations of the independent claim, it is believed that Claims 16 and 17 also recite in allowable form. Therefore, in view of the foregoing remarks, Applicants believe that the combination of Vedula et al., and Dungan et al., does not teach the presently claimed invention as recited for Claims 16 and 17 that the rejection of Claims 16 and 17 under 35 U.S.C. §103(a) has been overcome. Applicants request that the Examiner allow Claims 16 and 17.

Allowable Subject Matter

(27) The Examiner indicated that Claim 9, objected to as being dependent upon a rejected base claim, would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. However, in view of the remarks set forth in this Amendment, Applicants believe that the base claim for dependent Claims 9 is allowable. Therefore, Applicants respectfully request that the Examiner withdraw the objection to Claim 9.

Conclusion

The foregoing is submitted as a full and complete response to the Official Action mailed June 27, 2005, and it is suggested that Claims 1-32 are in condition for allowance. Reconsideration of the rejection is requested. Allowance of Claims 1-32 is earnestly solicited.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless Applicants have argued herein that such amendment was made to distinguish over a particular reference or combination of references.

Applicants acknowledge the continuing duty of candor and good faith to disclose information known to be material to the examination of this application. In accordance with 37 CFR §1.56, all such information is dutifully made of record. The foreseeable equivalents of any territory surrendered by amendment are limited to the territory taught by the information of record. No other territory afforded by the doctrine of equivalents is knowingly surrendered and everything else is unforeseeable at the time of this amendment by the Applicants and their attorneys.

The present application, after entry of this amendment, comprises thirty-two (32) claims, including seven (7) independent claims. Applicants have previously paid for thirty-two (32) claims including seven (7) independent claims. Applicants, therefore, believe that an additional fee for claims amendment is currently not due.

If the Examiner believes that there are any informalities that can be corrected by Examiner's amendment, or that in any way it would help expedite the prosecution of the patent application, a telephone call to the undersigned at (561) 989-9811 is respectfully solicited.

The Commissioner is hereby authorized to charge any fees that may be required or credit any overpayment to Deposit Account 50-1556.

In view of the preceding discussion, it is submitted that the claims are in condition for allowance. Reconsideration and re-examination is requested.

Respectfully submitted,

Date: 9/27/2005

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